

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied and clarified that Ning Zhou is the legal shareholder and owner of defendant FTS and legal member of T4C. Ning Zhou registered domain name addresses for his companies, namely FTS and T4C and the relationship between Zhou and FTS and T4C is that of a business owner and his legal entities.

6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.
15. Denied and clarified that FTS operates as web presence including use of the domain name address passforsure.co.uk, otherwise denied.
16. Denied and clarified that FTS operates as web presence including use of the domain name address cisco-certification-exam.org, otherwise denied.
17. Denied and clarified that FTS operates as web presence including use of the domain name address hp-certification-exam.com otherwise denied.
18. Denied and clarified that FTS operates as web presence including use of the domain name address ibm-certification-exam.org, otherwise denied.
19. Denied and clarified that FTS operates a web presence and for a period of time used the domain name address testkingdemo.com, otherwise denied.
20. Insufficient information to admit or deny therefore denied.
21. Admitted.
22. Admitted.
23. Admitted.
24. Admitted.
25. Admitted.
26. Admitted.
27. Admitted that the Court has personal jurisdiction as to FTS and T4C, otherwise denied.
28. Admitted that venue is proper as to FTS and T4C otherwise denied.
29. Insufficient information to admit or deny therefore denied.
30. Insufficient information to admit or deny therefore denied.
31. Admitted that Plaintiff obtained a copyright registration for software used for test-taking with an effective registration date of September 2, 2008.

32. Denied.
33. Insufficient information to admit or deny therefore denied.
34. Admit the first sentence, insufficient information to admit or deny the second sentence therefore denied.
35. Insufficient information to admit or deny therefore denied.
36. Insufficient information to admit or deny therefore denied.
37. Denied.
38. Denied, and clarified that prior use of the domain name addresses freetestking.org and testkingdemo.com ceased promptly upon the first notification from plaintiff of any notice or allegation of unfair competition.
39. Denied and clarified that prior use of the domain name address testkingdemo.com ceased promptly upon the first notification from plaintiff of any notice or allegation of unfair competition.
40. Denied and clarified that prior use of the domain name address provue.org ceased promptly upon the first notification from plaintiff of any notice or allegation of unfair competition.
41. Denied.
42. All prior Answers are incorporated by reference.
43. Insufficient information to admit or deny therefore denied.
44. Denied.
45. Denied.
46. Denied.
47. Denied.
48. All prior Answers are incorporated by reference.
49. Denied.
50. Denied.
51. Denied.
52. Denied.
53. Denied.
54. All prior Answers are incorporated by reference.
55. Denied.
56. Denied.

57. Denied.

58. All prior Answers are incorporated by reference

59. Denied

60. Denied.

61. Denied.

62. All prior Answers are incorporated by reference

63. Denied.

64. Denied.

65. Denied.

66. Denied.

67. Denied.

68. All prior Answers are incorporated by reference.

69. Denied.

70. Denied.

71. Denied.

72. Denied.

73. All prior Answers are incorporated by reference

74. Denied.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. All prior Answers are incorporated by reference.

80. Denied.

81. Denied.

82. Denied.

83. All prior Answers are incorporated by reference

84. Denied.

85. Denied.

86. Denied.

87. Denied that Defendants committed wrongful acts against Plaintiff and gained illegal profits.

88. Denied.

89. All prior Answers are incorporated by reference.

90. Denied.

91. Denied.

92. All prior Answers are incorporated by reference

93. Denied.

94. Denied.

95. Denied.

96. Denied.

#### AFFIRMATIVE DEFENSES

1. Plaintiff's claims are barred by the doctrine of unclean hands.
2. Plaintiff's claims are barred by the doctrines of laches and estoppel.
3. Plaintiff's claims fail to state a claim upon which relief can be granted.
4. Plaintiff's alleged federal copyright registration is invalid.

#### AFFIRMATIVE PLEADINGS

1. On information and belief Plaintiff actively infringes the copyrights of third parties.
2. On information and belief Plaintiff aids, abets, and induces others to infringe the copyrights of third parties in order to sell practice certification exam questions and answers.
3. On information and belief Plaintiff aids, abets, and induces others to breach contracts requiring third parties maintain the confidentiality of questions and answers from certification exam providers and does so to benefit Plaintiff.

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Defendants request a trial by jury.

WHEREFORE, Defendants FTS and T4C pray this Court Dismiss all Counts as alleged and Deny the Plaintiff the Relief it requests.

Respectfully submitted,

FreeTech Service Inc.  
TEST4CERT Ltd.

BY:       /JeffreyHGreger/       DATED: December 16, 2009

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**Certificate of Service**

I hereby certify that on this 16th day of December 2009, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

BY:           /JeffreyHGreger/            
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